

April 8, 2016

Ms. Marlene H. Dortch

Secretary, Federal Communications Commission

445 12th Street, SW Washington, DC 20554

RE: FCC IB Docket 12-267

Dear Madame Secretary:

At the invitation of the FCC with notice DA 16-367, I wish to comment on the proposed timeframe and implementation cost of Carrier ID (CID) for video uplink transmissions.

I am a small business owner/operator of three satellite news gathering "SNG" earth stations, or "satellite trucks". My specific area of expertise has been television news and special event coverage throughout North America. My uplink clients include all of the traditional TV news networks (ABC, NBC, CBS, PBS, CNN, FOX) as well as many others based in the United States and abroad.

Please consider the vital role small satellite news gathering operators like myself continue to play in news coverage nationwide. The implementation costs of Carrier ID threaten the business livelihood and existence of many small SNG operators.

Since 2003, I have personally covered hundreds of news events – both planned and unplanned – where I was many times the sole provider of services to a news broadcaster, the only truck on location, and the single source of information for a TV news audience. Many times had I not been available, the dissemination of vital news information from remote sites would have been either delayed significantly, altered, or would not have happened.

Multiple deployments to hurricane and natural disaster zones come to mind – among them were Hurricane Sandy in NJ, where I provided the only network pool truck for five US TV networks and Governor Christie at his emergency management center. There was Hurricane Irene that ravaged southern Vermont in 2012 (where I did a harrowing drive through the woods for CNN to get to a town that had been completely cut off – no roads in or out, no power, no phones).

There was Hurricane Rita, for which I deployed my SNG truck for ABC News, drove 2000 miles to get on location, and then provided the only network pool truck for President Bush during the aftermath of the storm. There was Hurricane Wilma, where I kept a national news show from a PBS station in Miami on the air for a week while the station engineers repaired and replaced damaged equipment after the storm.

I have operated for weeks in areas where public telecommunications infrastructure was either non-existent, destroyed or overloaded. I have travelled for thousands of miles to get to remote locations on behalf of my clients because there was no other SNG provider or any other transmission resource available at the time. As a small independent operator, I stepped up to work when other larger companies would not.

I believe SNG operations remain vital for providing news and information to the public.

Request for comment DA-16-367 specifically asks for documentation of costs of carrier ID compliant equipment, and I am including quotes for replacing the otherwise perfectly serviceable encoder/modulator gear in my trucks, which were all purchased in the last few years. Replacing (since I'm told CID upgrades are impossible) the existing equipment across my small fleet (2 modulators per truck X 3) would cost at least \$110,000 in equipment, plus labor, shipping and taxes, but that is just the financial cost.

There is a cost because the public would not be served if sources and pathways for news coverage via satellite using operators such as myself are reduced or eliminated.

There is a cost (sometimes to life and limb) if public officials cannot efficiently dispense information and instructions from disasters using SNG trucks operated by independent operators on behalf of news clients.

Small operators like myself have been financially challenged because of newer technologies that do not rely on satellite transmission, and we have lost business because of relentless technological changes (cellular bonding solutions and video over IP come to mind). Small SNG operators have been strained financially and may not be able to survive in business if they are required to retire perfectly serviceable gear.


May I suggest that it is in the interest of the public to allow existing, non "CID" compliant modulators in the hands of established operators with no records of interference issues to be 'grandfathered' and those operators be allowed to continue coverage from special events from which they have been effective for many years.

Alternatively, or additionally, the equipment manufacturers could provide the upgrades they claim are available at significantly reduced or no cost to existing SNG operators.

The FCC could also allow and approve the network information table "NIT" approach for identification instead of the modulator based "CID" approach, which most of the existing encoding equipment seems to support (regardless of modulation) and can often configure with a firmware upgrade if not already capable.

Still another option may be for existing equipment to be traded for new equipment by the manufacturers who have an obvious financial interest in premature obsolescence of the existing gear. Perhaps the retirement of 2 Ghz TV microwave gear during the Nextel re-banding could be a model.

Respectfully,



Christopher Borghesani

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